

PHILIP BENTLEY  
PARTNER  
PHONE 212-715-9505  
FAX 212-715-8000  
PBENTLEY@KRAMERLEVIN.COM

September 15, 2010

VIA ECF AND HAND DELIVERY

The Honorable Robert E. Gerber  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004-1408

Re: *Motors Liquidation Company, et al.*, Case No.: 09-50026

Dear Judge Gerber:

On behalf of the Official Committee of Unsecured Creditors, we write in response to the Notice of the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the "ACC") Regarding the Anonymity Protocol (the "Notice"), which the ACC filed yesterday afternoon.

Upon receipt of the Notice, we contacted counsel for the ACC concerning the briefing schedule proposed in the Notice, under which all parties would have until by 5:00 p.m. on September 17, 2010 to file submissions to the Court concerning the ACC's proposed "anonymity protocol." We and the ACC's counsel have agreed to modify their proposed schedule to provide as follows:

The ACC will file its written submission by 5:00 p.m. this Friday, September 17. Any responses to that submission will be filed by 5:00 p.m. on Monday, September 20. The Court will then schedule a hearing for the earliest possible date to resolve the dispute.

We respectfully request that the Court adopt this agreed schedule.

We note, finally, that the description of the factual history pertinent to this dispute set forth in the ACC's Notice, as well as in the letter filed yesterday evening by Stephen M. Juris, counsel for the Delaware Claims Processing Facility and certain trusts, is not, in our view, entirely accurate or complete. We will address these factual issues in the submission that we file on Monday.

I am available should the Court have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Philip Bentley", with a stylized flourish extending from the end.

Philip Bentley

cc (by email):

Stephen Karotkin, *Counsel to Debtors*  
Robert Weiss/Joseph Sgroi, *Counsel to New GM*  
Trevor Swett/James Wehner, *Counsel to*  
*Asbestos Claimants' Committee*  
Sander Esserman/Robert Brousseau, *Counsel to*  
*Future Claims Representative*  
Stephen M. Juris, *Counsel to Certain Trusts*  
Emily Stubbs, *Counsel to Manville Trust*  
Peter Friedman, Esq., *Counsel to U.S. Treasury*